EXHIBIT F



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Transcript of Benjamin Mann, Corporate Designee

Date: November 20, 2025
Case: Concord Music Group -v- Anthropic

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

- - - - - - - - - - - - - - - - x
CONCORD MUSIC GROUP, INC., et al., : Civil Action No. 5:24-cv-03811-EKL-SVK
Plaintiffs, :
v. :
ANTHROPIC PBC, :
Defendant. :
- - - - - - - - - - - - - - - - x

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VIDEOCONFERENCED (HYBRID) AND VIDEO-RECORDED

DEPOSITION OF DEFENDANT ANTHROPIC PBC

PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)

BENJAMIN MANN

San Francisco, California

Thursday, November 20, 2025

9:03 a.m. Pacific Standard Time

VOLUME I

Job No. 609867

Pages: 1 - 228

Reported By: April L. Crites, RMR, CRR, CSR, CCR

California Certified Shorthand Reporter

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DEPOSITION OF BENJAMIN MANN

HELD AT THE OFFICES OF:

WILMER CUTLER PICKERING HALE and DORR, LLP

50 California Street

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* * *

Pursuant to notice, and pursuant to the Federal Rules of Civil Procedure, before April L. Crites, RMR, CRR, CSR, CCR, and California Certified Shorthand Reporter No. 14493.

* * *

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I N D E X

EXAMINATIONS CONDUCTED PAGE

BENJAMIN MANN

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* * *

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BY MR. MILLER:
Q After publishers filed this lawsuit, did Anthropic stop including publishers' song lyrics in any datasets used to train Claude.
MS. MEHTA: Objection to the form.
And, Mr. Mann, you can answer that based on what's in the training data, but not based on any communications with counsel or actions taken at the direction of counsel.
THE WITNESS: I think, in order to make sure that I'm answering with the facts, the most useful thing is if you could produce the source code in question, and I could use that to definitively answer what actions we might have taken.
BY MR. MILLER:
Q Okay. So you're not able to answer that question without examining the source code directly?
[redacted]

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[redacted]
BY MR. MILLER:
Q Does Anthropic consider it important to include song lyrics, generally, in Claude's training data?
A I would say, no, I don't think we view it as important to include lyrics.
Q Well, Anthropic wants Claude to understand what song lyrics are, right?
A I believe. And I believe we have expert testimony that corroborates outside -- outside expert --
MS. MEHTA: I'm going to caution you not to disclose any outside expert testimony.
THE WITNESS: Okay.
MS. MEHTA: Just focus on what Anthropic knows. You're being deposed here as a witness for the company, so you can testify as to that.
THE WITNESS: Thanks.
So taking a step back, I believe that even if we didn't have the lyrics themselves, there are enough -- there's enough content in all the different kinds of data that we collect that is

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about songs, about lyrics, about the process of creating songs, that Claude would continue to have a strong understanding of what song lyrics are, and that there are enough analogs to song lyrics, such as poems, that are completely different, many of which are public domain, that Claude would have no problem understanding what song lyrics are and how to write new ones without access to any of the lyrics indicated in this case, let alone outside of the case.
BY MR. MILLER:
Q If Claude doesn't consider it important to include song lyrics in Claude's training data, why does Anthropic include song lyrics in Claude's training data?
MS. MEHTA: Objection to the form.
THE WITNESS: Well, you -- you mentioned if Claude doesn't believe that it's important, I think you meant --
BY MR. MILLER:
Q Excuse me. I'll -- thank you. I'll rephrase.
If Anthropic doesn't consider it important to include song lyrics in Claude's training data, why does Anthropic include song lyrics in Claude's

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training data?
MS. MEHTA: Objection to form.
THE WITNESS: So, in general, as I mentioned, our goal is to train helpful, harmless, and honest models, and push the frontier of safety research so that humanity's transition from society today to one in which there's super-intelligent AI is a safe and beneficial one for humanity.
In order to do that, we need to train frontier models with the best capabilities from a knowledge/work standpoint, from a hard sciences standpoint. Many of our customers work on hard sciences, and we believe that if things go well, then this technology could transform people's lives for the better. Those are the kinds of things that we really care about, and we've talked about that in length at public.
Dario has this essay called Machines of Loving Grace in which he paints a picture of the positive future that we could get to if things go well. Those are the kinds of things that we are optimizing for.
If song lyrics happen to be widespread on the Internet and are not behind robots.txt, are